Summary of Comments Received During the First Consultation for the Ports, Harbors and Terminals EHS Guideline

GENERAL

- These documents are out of date and need a significant re-write to align them with the IFC Performance Standards as revised 2012. Suggest a significant re-write and the inclusion of a specific section on Biodiversity and Ecosystem Services.
- Suggest adding a section that addresses changes to coastal hydrology (i.e. issues associated with altering the coastline, changing wave action and associated littoral drift resulting in potential impacts to water quality, coastal erosion and/or accretion, habitat disturbance).

DREDGING

- There is no provision in the Guidelines to allow port developers to propose appropriate/beneficial mitigation measures to compensate for unavoidable potentially adverse dredging impacts (e.g., improvement of a near-by wetland or salt marsh; creation of a new bird nesting site).
- Dredge spoil disposal alternatives assessment (such as selective dredging of pollution hot spots and treatment and/or disposal on land) as described in the Specific Guidelines for Assessment of Dredged Material under the London Convention and Protocol should be explicitly mentioned here as it represents good international industry practice in order to avoid unnecessary disposal of pollutant constituents to sea.

AIR EMISSIONS

- Much of this section focuses on emissions from ships. This topic should not be dealt with in these Guidelines but rather in the EHS Guidelines for Shipping.
- The provision of onshore power supply is currently not a standard practice. Any requirements regarding the provision of onshore power must be widely discussed by all interested parts so that a reasonable and feasible approach can be developed if indeed this is possible.
- Dust emissions: Covering transport vehicles is not universally practiced and would likely hinder port operations in some instances. It is cost-prohibitive and impractical from a worldwide implementation standpoint.

OCCUPATIONAL HEALTH AND SAFETY

- Physical Hazards: These measures apply to ships and should be deleted from these Guidelines and moved to the EHS Guidelines for Shipping as appropriate.
- Confined Spaces: Access to cargo holds is a ship-related issue and therefore any mention of cargo holds in this section should be deleted from these Guidelines and moved to the EHS Guidelines for Shipping as appropriate.

COMMUNITY HEALTH AND SAFETY

- Suggest including land-based traffic as a community safety consideration (marine traffic is already included).